

1 THOMAS P. QUINN, JR. (SBN 132268)
2 NOKES & QUINN APC
3 410 BROADWAY, STE 200
4 LAGUNA BEACH, CA 92651
5 Tel: (949) 376-3500
6 Fax: (949) 376-3070
7 Email: tquinn@nokesquinn.com

8 Attorneys for Defendant EQUIFAX
9 INFORMATION SERVICES LLC

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 MARYNA PYLPCHUK,

13 Plaintiff,

14 vs.

15 EQUIFAX INFORMATION
16 SERVICES LLC and DOES 1
17 THROUGH 10, INCLUSIVE

18 Defendants.
19

Case No.:

NOTICE OF REMOVAL

20 Defendant, Equifax Information Services LLC (“Equifax”), by Counsel, and
21 hereby file this Notice of Removal of this action from the Los Angeles County
22 Superior Court, California, wherein it is now pending as Case No. BC578937 to the
23 United States District Court for the Central District of California. This Notice of
24 Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof,
25 Defendants show this Court as follows:

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1 1. An action was filed on April 20, 2015 in the Los Angeles County
2 Superior Court, California, entitled *Pylypchuk v. Equifax Information Services LLC*,
3 *et al.*, Case No. BC578937 (the “State Court Action”).

4 2. Equifax was served with the Complaint on April 24, 2015.

5 3. This Notice is being filed with this Court within thirty (30) days after
6 Equifax was served with a copy of Plaintiff’s initial pleading setting forth the
7 grounds for her action and her claims for relief.

8 4. This Court has original jurisdiction over this case pursuant to 28
9 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or
10 treaties of the United States, specifically 15 U.S.C. § 1681 *et seq.*, otherwise known
11 as the Fair Credit Reporting Act (“FCRA”), as follows:

12 (a) Plaintiff’s Complaint, on its face, alleges a violation of the FCRA.
13 (See Plaintiff’s Complaint).

14 (b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action
15 alleging a violation of its provisions “may be brought in any appropriate United
16 States district court without regard to the amount in controversy”

17 5. Promptly after the filing of this Notice of Removal, Equifax shall give
18 written notice of the removal to Plaintiff and to the Clerk of the Los Angeles
19 County Superior Court, California, as required by 28 U.S.C. § 1446(d).

20 6. Attached hereto, as Exhibit A, are copies of the Summons and
21 Complaint served upon Equifax in the State Court Action.

22 WHEREFORE, Equifax requests that the above-described action be removed
23 to this Court.

24 Dated: May 26, 2015

NOKES & QUINN

26 /s/ Thomas P. Quinn, Jr.

27 THOMAS P. QUINN, JR.

Attorneys for Defendant

28 EQUIFAX INFORMATION
SERVICES LLC

CERTIFICATE OF SERVICE

Maryna Pylypchuk v. Equifax Information Services LLC
Case No.

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Orange, State of California, and not a party to the above-entitled cause.

On **May 26, 2015**, I served a true copy of:

NOTICE OF REMOVAL

☐ By personally delivering it to the persons(s) indicated below in the manner as provided in FRCivP5(B);

☒ By depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following;

Howard D. Silver, Esq.
Law Offices of Howard D. Silver
638 Lindero Canyon Road, Suite 421
Oak Park, CA 91377
Tel: (818)597-2610
Fax: (818)879-0862
Email: hsilver283@aol.com
Attorneys for Plaintiff,
Maryna Pylypchuk

☒ By ECF: On this date, I electronically filed the following document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

/s/ Jennifer J. Maston
JENNIFER J. MASTON

Place of Mailing: Laguna Beach, California.

Executed on **May 26, 2015**, at Laguna Beach, California.

SERVICE LIST

Howard D. Silver, Esq.
Law Offices of Howard D. Silver
638 Lindero Canyon Road, Suite 421
Oak Park, CA 91377
Tel: (818)597-2610
Fax: (818)879-0862
Email: hsilver283@aol.com
Attorneys for Plaintiff,
Maryna Pylypchuk